



# Responsible Gaming





## *For us, promoting Responsible Gaming is the very essence of doing business, and it involves a strategy that looks at the gaming industry in the long term*

We have developed a Responsible Gaming model based on advanced research and tools to identify and prevent negative phenomena. Thanks to the development of Artificial Intelligence technologies and tools interacting with in-depth socio-behavioural analysis and investments in ongoing training programmes for our points of sale and the

retail network, we have defined a programme to increase players' awareness and at the same time reduce their potential risks. And thanks to our omnichannel model, we've been able to put players front and centre and build an information and support network around them to promote and guarantee healthy, safe and responsible behaviours.

## Main steps forward in 2023

### Development and patenting of the A.D.A. algorithm

for identifying problem players  
(page 93)

### 1,453 hours of training

provided to employees on Responsible Gaming  
(page 96)

### 30,000 players involved

in our research activities  
(page 91)

Promotion of the first

### Research Doctorate in Responsible Gaming

in collaboration  
with Università Cattolica in Milano  
(page 92)

Creation of the






### FAIR Foundation

to promote the development of a culture and tools for preventing problem gambling by putting Responsible Gaming at the centre of change in the industry  
(page 8)




### Certification of Sisal's approach to Responsible Gaming in Italy

by the Italian Patents and Trademarks Office  
(page 94)

## Our objectives

  	Target value	Year	Progress in 2023	
Players using Play Well tool* (Italy)	94%	2024	94%	
Specialist retailers who have received training (Italy)	100%	2024	100%	

\* Play Well tool: tools to support and protect players, for the prevention of problem players.

 Target achieved    
  Progress in line with target    
  New Target



Sisal also contributes to the “**Play Well**” pillar of **Flutter’s Positive Impact Plan**, which expresses the Group’s commitment to “putting customers at the centre of everything and giving them a positive entertainment experience”.  
 The Group aims to **extend use of the Play Well tools to 75% of players by 2030**.

### Sisal’s contribution

**94%**  
of players use Play Well tools in Italy

**100%**  
of retailers have had  
Responsible Gaming training

### Play Well: Goal

**75%**  
of players must use Play Well tools  
by 2030

# The Responsible Gaming strategy

The current economic and social context calls for a radical review of the strategies adopted by the industry to date and the promotion of a culture of gaming that puts the emphasis on entertainment and avoids excess.

It therefore becomes vitally important to **adopt a proactive stance** that involves the entire organisation and aims to identify elements and actions serving a Responsible Gaming model capable of preventing the deviations potentially latent in the offering, thus guaranteeing players' safety and encouraging healthy and conscious gaming behaviour.

This makes it possible, on one hand, to ensure continued spending by current and potential consumers with a view to medium-long term sustainability, and on the other to **have a direct impact on the reputation of the industry and the individual companies**, by restoring the concept of fun to gaming.

**Responsible Gaming is therefore at the core of Sisal's sustainability strategy.** To guarantee effective integration of our initiatives in the wider context of the gaming ecosystem, we apply international best practices within the Group and work closely with Flutter Entertainment to integrate our Responsible Gaming Programme with the **Play Well pillar of the Positive Impact Plan (PIP)**.

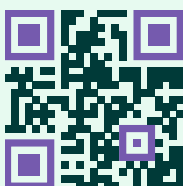
This synergy enables us to maximise the impact of our actions and promote a responsible gaming culture on a wider scale.

In line with its corporate Purpose, Sisal intends to offer the best gaming experience and generate value for the company and its people, with the goal of achieving the status of international leader in Responsible Gaming.

For this reason, we have set the goal of having **94% of players using a Play Well tool by 2024**, to uphold our commitment inspired by the highest international standards and the following guiding principles: care, respect, listening, and consumer protection.

Our goal is to bring about real change within the industry and generate economic and social value for the company, for the value chain we are part of, and for the community.

**15**  
active  
working  
groups



Listen to the interview with  
**Stefano De Vita**, Responsible Gaming & Global Research Director  
Responsible Gaming in Sisal

For Sisal to pursue this goal, we have created a **dedicated function** for defining our Responsible Gaming strategy and the development, implementation, monitoring and continual updating of the **Responsible Gaming Programme**.

The governance of our Responsible Gaming commitment is under the direct control of the CEO, who has the last word on approval of the Responsible Gaming annual strategic plan and on supervision of its implementation.

Based on research results and the current and potential risks identified, we have also set up **12 operational and cross-functional working groups in Italy and 3 in foreign countries**, to ensure that Responsible Gaming is an integral part of the business. These working groups work within their areas of responsibility and also elaborate

pilot solutions for the development of new player protection tools.

Monitoring of performance indicators and key actions is discussed on a quarterly basis with the Leadership Team in the Sustainability Committee, as well as in periodical meetings with the working groups.

To guarantee effective continuous governance for the development of an innovative strategic path, we also decided to set up a **Responsible Gaming Coordination Committee**, made up of external experts from various areas (from IT to communication and clinical), to help define Sisal's evolving guidelines on Responsible Gaming. This Committee also provides supervision and oversight of research work to guarantee high quality standards.

### Responsible Gaming Certifications

We have been certifying our Responsible Gaming programme since 2011, in line with the highest standards set by European Lotteries (EL) and the World Lottery Association (WLA). The standards identify the key issues for operators to promote responsible gaming and groups them into eleven sections.

In 2023, the certifications were renewed for the fifth time in a row at the top level (level 4). Specifically, we conform to EL standards with maximum scores in seven sections: responsible gaming governance, points of sale, game design, player education, stakeholder engagement, research and amusement devices.

Following a process of alignment at international level, the foreign subsidiaries are launching activities to achieve adequate levels of compliance with international standards by sharing Sisal's Responsible Gaming guidelines. Specifically, in December 2022, Sisal Sans in Türkiye obtained WLA level 2, while Sisal Loterie Maroc contributes to the certification of SGLN (Société de Gestion de la Loterie Nationale) according to the EL standard.

# Sisal's Responsible Gaming Programme

Our **Responsible Gaming programme**, in line with our Purpose and at the core of the business strategy, protects players, especially those in more vulnerable categories, through information campaigns, prevention of problem gaming phenomena, and support for people with critical gaming-related issues.

which is integrated with all the business areas and channels, based on the engagement of all the relevant stakeholders – from employees to retailers, from gamers to research organisations – and aligned with the main international standards in the industry.

“Responsible Together” sums up our approach,





## Investments in scientific research

*In partnerships with universities to understand gaming behaviours and develop a predictive model for problem phenomena.*

We monitor and analyse perceptions and sensibility regarding Responsible Gaming through studies and research to understand in depth how players' behavioural models change and to offer effective answers to the phenomenon of problem gaming.

All our gaming-related activities draw on social research into the characteristics and behaviour of our customers.

In 2022, we consolidated an integrated project for monitoring problem players, with the aim of continuously tracking online and offline gaming behaviour in order to be able to profile our players in terms of risk levels, attitude to and experience of gaming, as well as any pathological conditions. All this thanks to a questionnaire addressing the entire customer base and in line with the rigorous international recommendations of the Problem Gambling Severity Index (PGSI)<sup>25</sup>, supplemented by a set of socio-demographic questions.

Over  
**30,000**  
customers  
involved in surveys  
in 2023

Over  
**1,000**  
players  
under 25 chose  
to spontaneously  
answer  
questions on gaming

This involved over 30,000 of our customers in two separate moments and built a richly structured database that helps us better understand the characteristics of Sisal players and identify a series of protection measures in line with their risk levels.

This dataset feeds our working groups, which form the framework of the Responsible Gaming programme with the direct involvement of individual business functions and the Artificial Intelligence algorithm learning process, driving evolutionary development and continuous performance improvement. Thanks to the research carried out, it was possible to develop, in collaboration with Università Cattolica in Milan, a new PGSI analysis model that aims to define a different and more profound classification of problem players in three clusters on the basis of gaming behaviours and psychological motivations, and the identification of risk indicators enabling prompt and personalised intervention. We have also included specific mitigation areas in the model, in line with the characteristics of our product portfolio and the sales network<sup>26</sup>.

<sup>25</sup> The Problem Gambling Severity Index (PGSI) is a standardised tool used to assess the severity of problem and pathological gambling, widely recognised as the international benchmark in the field of responsible gambling. It provides reliable and objective measuring of gambling-related behaviours and enables operators and regulators to identify players who might need support or intervention. Its importance lies in its scientific validity and capacity to provide data of use in designing and implementing effective programmes for preventing and treating problem gambling.

<sup>26</sup> Please refer to the in-depth analysis for more details (page 97).



The results of the new research model have been scientifically validated with the publication of the paper “Drawing Problem Players” Profile in Italy: A Comprehensive Categorization from a Behavioral, Psychological, and Socio-demographic Perspective”<sup>27</sup>.

Dialogue with players is also driven by a feedback process that strengthens their sense of trust. 83% of the players who took part in the survey, in fact, chose to receive the results of the analysis of gaming behaviours and the associated risks. The results were criticised in only one case, which demonstrates the gradual development of awareness of the risks associated with a given gaming behaviour.

**83%**  
of participants  
in surveys  
chose to receive  
our analysis  
results

### Promotion of the first research doctorate in Responsible Gaming

In collaboration with Università Cattolica in Milan, we launched the first research doctorate in Responsible Gaming. Wholly funded by Sisal and with the approval of Università Cattolica’s Ethics Committee, the first research doctorate in Responsible Gaming was formalised in 2023. With a minimum of three publications in three years, it is designed to promote comparative behavioural analysis between Italy and the other countries regarding gaming models, the responsible gaming activities implemented and their efficacy. This is an important step towards overcoming the stereotyped view of the sector and being able to address government and public opinion with the same authoritativeness as other sectors deemed less critical. The doctorate involves research work at the university and laboratory activities at Sisal.

## Development of player protection tools

*Through technological innovation and artificial intelligence, and also thanks to transparent communication.*

### Risk assessment in game development

Since 2010, we have been monitoring the risk factor of our games using GAM-GaRD, which provides an accurate assessment of the social risk associated with each new game before it is marketed

Created by Canadian company GamRes, it can be used to examine game dynamics applied to the de-

velopment of effective strategies and tools at the service of responsible gaming and underlying communication strategies. Developed by an international team of psychologists and researchers, it analyses a game’s structural characteristics (duration, maximum payout, frequency of prize draws, etc.) and features (accessibility of gaming venues/shops, opening hours, etc.) based on parameters devised and tested by a panel of world experts.

We also reviewed Sisal’s Game Design procedure and introduced, right from the project study and design phase, a risk classification associated with gaming products that takes account of the principles and criteria of our Responsible Gaming programme.

27 Source: Micro & Macro Marketing (ISSN 1121-4228).

## Online channels

We continuously improve the online gaming experience on our portals and digital applications, as well as through advanced technologies that guarantee safe, age-restricted gaming procedures designed to promote aware and balanced gaming behaviour.

Our commitment to digital security is based on implementing technologies and tools capable of preventing underage people from accessing the online gaming offering, also through internal controls (starting with the registration process for opening a gaming account).

We also avail ourselves of the central systems of the Agenzia delle Dogane e dei Monopoli (Customs and Monopolies Agency) to verify players' personal details, including date of birth and tax code, in real time.

Any applicant who is not an adult Italian citizen with a valid tax code is denied entry. To complete the registration process and enable us to verify the data entered, the applicant is asked to submit a copy of an identity document of the person who filled out the form within 30 days. Failure to meet this deadline entails automatic suspension of the account.

We also assure a safe and balanced gaming experience on our digital channels thanks to<sup>28</sup>:

- The “What sort of player are you?” self-assessment test, redefined in 2022 in collaboration with Università Cattolica's EngageMind Hub to develop new research areas and include socio-behavioural and psychological variables for precise and highly detailed customer profiling; consumers can thus be informed in real time of any problem situations.
- The “Ten rules for the Responsible Player” and “Useful tips for Responsible Gaming”, designed to foster an aware and informed approach to gaming.
- Tools for monitoring an account's credit and debit transactions over the last three months, available in the “My Account” section of the player's personal area.

- Temporary/permanent self-limitation and self-exclusion tools for players. For example, we have significantly reduced gaming account deposit limits, which lowers the level of risk players are exposed to, and introduced play breaks.
- Tools to tackle fraudulent use of personal data and credit cards and prevent potential money laundering operations, guaranteeing a very high level of security for our websites.
- Prevention tools such as the innovative management procedure for at-risk customers in the online channel, based on precise indicators that make it possible to identify and prevent potentially problematic behaviour.

## A.D.A: Artificial Intelligence for Responsible Gaming

Following our studies, collaboration with IT experts and the technologies available for gathering and analysing data from different gaming platforms, we invested in the development of Artificial Intelligence tools to define new player clusters and be able to guarantee predictive identification of at risk gaming behaviours.



<sup>28</sup> Tools implemented for Italy and extended to Morocco and Türkiye in 2024.

## Sisal has patented its Responsible Gaming method in Italy

In February 2024, we obtained the Italian patent on our Responsible Gaming method for automatic recognition and mitigation of gaming-related at-risk behaviours. Issued by the Italian Patents and Trademarks Office, it **recognises the uniqueness of our approach and its capacity to offer a concrete solution for preventing problem gambling.**

The patented system will make integrated use of the **dataset** containing the gaming transactions of a subject in a given period, **behavioural analysis**, the **Artificial Intelligence algorithm** and any activation of **mitigation action** specifically identified with expert support.

This method was also presented as a **case study at the UN event in Cannes** by the consulting firm ServicePlan, which handled media communication.

In particular, the **A.D.A. (Anti Dependence Algorithm)** is an Artificial Intelligence system resulting from Sisal's strong focus on technological innovation and behavioural research. Based on our socio-behavioural model defined in collaboration with Università Cattolica and fed by real data from the gambling experiences of over 600,000 customers every month, this algorithm can analyse players' behaviours and flag any signs of problems, thus predicting at-risk behaviours and profiles with seven times more accuracy than the previous version.

This tool is a clear example of how investment in digital innovation intersects the commitment to responsible business, as well as being our solution to provide a truly safe gaming experience.

## Retail channel

**High standards of protection for our players are also guaranteed in the retail channel, thanks to the vital role played by our points of sale in providing information and awareness raising about safe and conscious gaming behaviour.**

Our stores have information material about the ban on underage gaming, the rules and probabilities of winning, the risks caused by gambling and the sup-

port centres available, as well as details on how to take the **"What sort of player are you?"**, test for players to assess their risk profile.

A **"Safety Button"**, has also been developed and installed on gaming terminals to make it easier to contact support services for at-risk customers.

Our retailers take special training courses on Responsible Gaming so that personnel are aware of the risks connected with gambling and have the knowledge and tools to provide problem players with support.

Training, correct display of info materials and sufficient knowledge and use of player protection tools are also mandatory requisites for obtaining **Responsible Gaming Certification** (see relevant box above). A point of departure in a process of continuous improvement geared to guaranteeing respect for players and their protection by creating new best practices for Responsible Gaming.

In the AWP area, the pilot player protection project launched in 2022 has been extended, with the aim of introducing time and spending limits for Slot Machines and Video Lottery Terminals in a sample of our points of sale. This application is one of the most advanced prevention models applied to AWP machines in Italy.

### “Safe Gaming” certification of our stores

The goal of guaranteeing maximum customer protection is an integral part of our corporate identity. It's why we were the first gaming operator to implement a **Store Certification** project to make our stores recognisable to consumers and the public in general as centres of legality and excellence in Responsible Gaming management.

In 2022, we initiated a complex process of adopting Responsible Gaming standards and best practices that involves not only the proper display of signage but also appropriate training of managers, including knowledge of Player Protection tools. Under this project, an accredited external certification organisation annually verifies compliance with the relevant technical requisites and correct implementation of the internal control system.<sup>29</sup>

**As of April 2023, 527 of the direct and specialised points of sale in our network were certified.**

## Education in balanced and aware gaming

*From Sisal employees to retailers and customers, training to promote responsible gaming culture and behaviour.*

### Player education

**Our primary responsibility is to spread a gaming culture that puts the emphasis on entertainment and avoids excess. That is why we plan and provide information and education opportunities on the use of our products, promoting aware and balanced gaming behaviour across all gaming channels.**

Player awareness raising is carried out at various levels and coordinated across all contact channels to ensure that the message reaches all our customers and potential players through the physical distribution network covering the entire territory and our digital channels. Our point-of-sale network therefore plays a vital role in providing information and raising awareness, acting as an important point of reference for players across the country.

Retailers are provided with kits containing all our Responsible Gaming tools and information, available on gaming materials, customer displays (the player-facing terminal screens) and store dressing materials. These materials contain not only the features and rules of play, but also useful information to learn more about the product, including links to our digital channels.

Also appearing in a prominent position on all forms of communication are the **ban on underage gaming**, the notice about the **risks caused by problem gambling** and information about the **probability of winning**.

In 2023, the Responsible Gaming section of Sisal's websites and online gaming apps was totally renewed (both texts and graphics) to give even more effective support to all players and inform them about Sisal's protection tools.

<sup>29</sup> For more information, see the Certification Rules in the Industry Certification - Industry Docs section. Certificates issued by ITALCERT on the basis of Sisal's Technical Specification for Responsible Gaming certification of Sisal points of sale.



We developed new content, described the Player Protection services and functions, and invited users already logged on to take action through direct access. The new section also has information differentiated by product, for a responsible gaming experience that avoids excess.

## Point-of-sale training

**Our network represents us in local communities, which is why we plan training programmes on gaming-related issues, with a special focus on regulatory aspects and customer protection.**

Since 2008, all our Italian points of sale can access the online courses at any time using an e-learning platform available 24/7. In 2023, we introduced two more new obligatory training courses for the entire retail network, involving over 26,850 retailers across Italy. 100% of the specialist points of sale in Italy completed their training online. Audio-video lessons, illustrations and exercises provided retailers with access to content that can be put immediately into practice. Specific awareness-raising activities targeted the prohibition of underage gambling and the protection of the most vulnerable clusters.

We are also constantly monitoring the level of awareness of Responsible Gaming issues in our points of sale by means of a Mystery Inspector survey.

## Employee awareness raising

**Awareness raising and training of colleagues on Responsible Gaming and related risks are central to our strategy.**

Sisal employees do obligatory training on the Responsible Gaming Programme and the importance of sustaining a balanced gaming model that avoids excess and is geared to protecting the more vulnerable categories. Training sessions end with a questionnaire to check that participants have assimilated the material. Colleagues are also given updates on the areas of intervention and new initiatives introduced via the internal communication channels, thus generating increasing awareness of the central role of the programme and developing deep commitment to its principles and values.

All Sisal employees are also trained and constantly supported by means of meetings with clinical experts and psychologists specialising in the prevention and treatment of pathological gaming.

**26,850**  
points of sale  
trained  
on Responsible  
Gaming

**1,129**  
employees trained  
in 2023

**1,453**  
hours of training provided  
in 2023

During our Sustainability Month (organised between October and November 2023), Sisal employees were able to participate in two Luiss Business School seminars focusing on Responsible Gaming. These events were precious opportunities to gain in-depth knowledge of the dynamics at work in the design, management and communication of a responsible product.

The responsible product concept was highlighted as an element of fundamental importance in a sustainable enterprise. Such a product not only generates a positive economic impact, but also makes a significant contribution to environmental and social sustainability, while fostering stakeholders' trust in the business, the company and its brand. It was pointed out that to ensure products are responsible, it is important to go beyond mere compliance and commit to concrete action by actively involving the entire company.

This entails a full sustainability-oriented review of the production process from design and production to marketing, distribution and customer relationship management.

Through its concrete commitment and holistic approach to responsible products, Sisal aims to make a tangible contribution to the promotion of a more sustainable and responsible gaming industry

## Player support

***A focus on consumers that goes beyond gaming practices and involves providing assistance even when gaming is no longer fun.***

Our responsibility towards players ranges from the game design phase through to mitigation of any potential negative impacts, providing expert support for players who may have developed a gaming-related disorder. This works through two main channels:

- **The totally free online treatment service provided by FeDerSerD** (Italian Federation of Addiction Departments and Service Operators) is wholly funded by Sisal. With the support of experienced therapists, courses of treatment are available based on individual needs.
  - **the website** [www.gioca-responsabile.it](http://www.gioca-responsabile.it)
- **The Italian national freephone number for gambling-related issues (TVNGA) at the Istituto Superiore di Sanità**, a team of professionals provide anonymous advice and guidance for people who have developed problems caused by compulsive gambling, as well as for their families.
  - **800.558.822, from landline and mobile phones, Monday to Friday, 10am to 4pm**

All our informative communications on Responsible Gaming reference the help centres and give details for those wishing to check their risk profile using the “What sort of player are you?” test.

## Performance measurement system

*Based on research and our experience in the sector.*

We have defined a scorecard for the periodic measurement of results to enable progress monitoring on Responsible Gaming targets. The main KPIs are updated through a monthly performance assessment and evaluated by the Leadership Team to gauge the effectiveness of the Programme and implement any necessary corrective actions.

## Adapting the strategy for foreign subsidiaries

*We engage teams in our foreign subsidiaries to actively promote the strategy in their different contexts.*

**As part of Sisal's internationalisation process, we are committed to promoting our approach to Responsible Gaming in all the countries where we operate.** This means not only introducing, where applicable, practices and tools developed for the Italian market, but also promoting a shared culture of gaming as a form of entertainment that avoids excess.

Every country has its own gaming rules and customs, so it's necessary to get everyone in our local teams to promote our Responsible Gaming strategy and to propose and develop initiatives compatible with local legislation and circumstances.

The following are examples of how the Responsible Gaming Programme was developed in our foreign subsidiaries in 2023.

- **Implementation of responsible gaming policies:** Sisal's foreign subsidiaries adopted policies geared to promoting responsible gaming behaviour among their customers. This included adopting daily and/or weekly deposit limits, self-exclusion and control tools for identifying and helping players with problem behaviours.
- **Personnel training:** Sisal's foreign subsidiaries invested in personnel training to guarantee better understanding and management of responsible gaming. Such training concentrated on raising awareness about the signs of problem gambling and also tips and best practices for effectively managing complex situations through empathy.
- **Collaboration with local organisations:** contacts were made with local organisations, such as problem gambling consulting centres and academic research bodies, with a view to developing partnerships and implementing prevention and support programmes.
- **Monitoring and evaluation of results:** Sisal's foreign subsidiaries implemented monitoring and evaluation systems for measuring the effectiveness of responsible gaming initiatives. This involved gaming data analysis, customer satisfaction surveys and feedback from personnel to identify areas for improvement and best practices.

These examples illustrate Sisal Group's commitment to the continuous development and improvement of its Responsible Gaming Programme in 2023, with the aim of guaranteeing a safe and responsible gaming experience for all customers.

# In-depth: Problem gaming

**Problem gaming is characterised by players having difficulty setting limits (on spending, time, the gambling impulse itself) despite the fact this has negative consequences not only for themselves but also for their families.**

If not recognised and managed, problem gambling can turn into **pathological gambling**, a clinical disorder characterised by a real addiction that can compromise the physical and psychological health and even the social life of the person affected.

## Problem gaming behaviours

The main behaviours associated with problem gaming include:

- The need to bet increasing amounts of money or to play again immediately after losing under the illusion of winning the money back.
- Gambling because bored, stressed or feeling guilty or depressed.
- Gambling on more than one table or with a variety of games in pursuit of potential winnings.
- Repeated failed attempts to stop gambling, sometimes accompanied by high irritability.
- Denial of being a player or taking measures to conceal bets.
- Presuming that others can be relied on to remedy a financial situation compromised by gambling (resulting in requests for money).
- Endangering or loss of important relationships or educational or career opportunities due to gambling.

## Problem player categories in the Sisal modell

In a survey conducted in collaboration with Università Cattolica in Milan<sup>30</sup>, published in 2023, we defined three different categories of problem players on the basis of their unique characteristics in terms of demographic, behavioural, psychological and physiological details.

1. **“The Relax Seekers”**: players who see gaming as a way to unwind and relax, a distraction from worries that negatively affect their mood.
2. **“The Disappointed Gain-Oriented”**: players driven primarily by the desire to win and who tend to worsen their emotional state after gaming, despite having a strong perception of the seriousness of problem gaming.
3. **“The Adrenaline-Filled”**: players driven primarily by the search for excitement and strong emotions, who display impulsive behaviour and do not seem to recognise any risk either before or after playing.

30 Sesini, G., Castiglioni, C., De Vita, S., Cesti, B., Graffigna, G., *Drawing Problem Gamblers' Profile in Italy: A Comprehensive Categorization from a Behavioral, Psychological, and Socio-demographic Perspective*, <<MICRO & MACRO MARKETING>>, 2023; (Early access): 1-23. [doi:10.1431/108162] <https://hdl.handle.net/10807/255515>.